

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

No. 23-cr-160 (NEB/JFD)

v.

DANTRELL JOHNSON (2)

a.k.a. Trell Moe

GREGORY HAMILTON (3)

a.k.a. Lil' Lord

KEON PRUITT (4)

a.k.a. KenKen

JOVAN KNIGHT (5)

a.k.a. JoJo

a.k.a. 23

TYREESE GILES (6)

a.k.a. Reese

JOSIAH TAYLOR (7)

a.k.a. Joker

JARRETT ROBINSON (9)

a.k.a. Gator

TREVAUN ROBINSON (10)

a.k.a. Tricky Tre

CHRISTOPHER FINCH (12)

a.k.a. Twin

CORTEZ BLAKEMORE (14)

a.k.a. Tez

RANDY TATE (15)

a.k.a. Randy

TREVONEIA FELTON (16)

a.k.a. Tre

MALCOLM SAMUELS (18)

a.k.a. Reggie

WILLIAM BANKS (19)

a.k.a. Bear

a.k.a. Big Will

RONALD WASHINGTON (20)

**TO BE FILED UNDER SEAL**



United States v. Brown et al.

    a.k.a. Black  
    WILLIAM JOHNSON (21)  
        a.k.a. Lil' Will  
    DASHAUN MORRIS (22)  
        a.k.a. Mush  
    EARNEST BOYD (23)  
        a.k.a. Shaky Shawn  
    ISAIAH BELL (25)  
        a.k.a Fatty  
    GREGORY BROWN (26)  
        a.k.a. Lil' G  
        a.k.a. Knowledge  
    MARQUES WALKER (27)  
        a.k.a. Q  
        a.k.a. Quez  
    DEANDRE POE (28)  
        a.k.a. Squizzy  
        a.k.a. Fat Squad  
    CLINTON BROWN (29)  
        a.k.a. CJ  
    AMARJAH LESTER (30)  
        a.k.a. M-Thang  
    CHRISTOPHER LEE WASHINGTON (31)  
        a.k.a. Flock  
        a.k.a. David Hendricks  
    ERNEST KETTER (32)  
        a.k.a. Shakedown  
    ROBERT LESURE (33)  
        a.k.a. Bibby Folks  
    AVANTE NIX (34)  
        a.k.a. Fat Folks  
    ARRON DAVIS (35)  
        a.k.a. A-Boogie  
    DASHAWN JACKSON (36)  
        a.k.a. D-Nice  
    LENEAL FRAZIER (37)

United States v. Brown et al.

a.k.a. Lil' Choppa  
a.k.a. Baby Choppa  
JADARIUS WRIGHT (38)  
CARLOS SERRANO (39)  
a.k.a. Nogoodlos  
a.k.a. Los

**SUPERSEDING INDICTMENT**

The Grand Jury charges:

**COUNT ONE**

**Racketeer Influenced and Corrupt Organizations (RICO) Conspiracy**  
**(Violation of 18 U.S.C. § 1962(d))**

The Enterprise

1. At all times relevant to this Superseding Indictment, the defendants, **Dantrell Johnson, a.k.a. Trell Moe (“D.Johnson”); Gregory Hamilton, a.k.a. Lil’ Lord (“Hamilton”); Keon Pruitt, a.k.a. KenKen (“Pruitt”); Jovan Knight, a.k.a. JoJo, a.k.a. 23 (“Knight”); Tyreese Giles, a.k.a. Reese (“Giles”); Josiah Taylor, a.k.a. Joker (“Taylor”); Jarrett Robinson, a.k.a. Gator (“J.Robinson”); Trevaun Robinson, a.k.a. Tricky Tre (“T.Robinson”); Christopher Finch, a.k.a. Twin (“Finch”); Cortez Blakemore, a.k.a. Tez (“Blakemore”); Randy Tate, a.k.a. Randy (“Tate”); Trevoneia Felton, a.k.a. Tre (“Felton”); Malcolm Samuels, a.k.a. Reggie (“Samuels”); William Banks, a.k.a. Bear, a.k.a. Big Will (“Banks”); Ronald Washington, a.k.a. Black (“R.Washington”); Dashaun Morris, a.k.a. Mush (“Morris”); Isaiah Bell, a.k.a. Fatty (“Bell”); Gregory Brown, a.k.a. Lil’ G, a.k.a. Knowledge (“G.Brown”); Marques**

United States v. Brown et al.

**Walker, a.k.a. Q, a.k.a. Quez (“Walker”), Deandre Poe, a.k.a. Squizzy, a.k.a. Fat Squad (“Poe”), Clinton Brown, a.k.a. CJ (“C.Brown”), Amarjah Lester, a.k.a. M-Thang (“Lester”), Christopher Lee Washington, a.k.a. Flock, a.k.a. David Hendricks (“C.Washington”), Ernest Ketter, a.k.a. Shakedown (“Ketter”), Robert Lesure, a.k.a. Bibby Folks (“Lesure”), Avante Nix, a.k.a. Fat Folks (“Nix”), Arron Davis, a.k.a. A-Boogie (“Davis”), and Dashawn Jackson, a.k.a. D-Nice (“Jackson”), and others known and unknown to the Grand Jury, were each members and associates of a criminal organization, namely, the “**Highs**,” (hereinafter, “The Enterprise” or “the Highs”), which was engaged in, among other things, acts of violence to include murder, assault, robbery as well as drug distribution and firearms trafficking. At all times relevant to this Superseding Indictment, the Highs operated in the District of Minnesota, and elsewhere.**

2. The Highs, including its leadership, membership, and associates, constituted an “enterprise,” as defined by 18 U.S.C. § 1961(4), that is, a group of individuals associated in fact. The Highs constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise. The Highs were engaged in, and its activities affected, interstate and foreign commerce.

Structure of the Enterprise

3. The structure and operation of the Highs included, but were not limited to, the following:

- a. The Highs have been in existence in Minneapolis since approximately 2008, and were primarily active in the northside of Minneapolis.

United States v. Brown et al.

- b. Prospective Highs members proved their loyalty to the gang by “putting in work”; that is, by committing acts of violence for the benefit of the gang or offering another benefit to the gang such as, for example, introducing a source for drugs or firearms.
- c. The Highs had members who were more respected than others and are considered leaders. These members controlled the drug trade in Highs territory. Further, these members often took the lead in obtaining and distributing firearms following an act of violence against the Highs by a rival gang for purposes of retaliation.
- d. Highs members used common phrases on social media to publicly identify themselves with the Enterprise. For example, Highs members commonly posted “Broadway” on social media, referring to the intersection at West Broadway Avenue and Lyndale Avenue North, and “Y” referring to YNT, a clique within the Highs.
- e. Highs members often disrespected and mocked deceased rival gang members in social media posts. Conversely, Highs members commonly paid tribute to deceased or incarcerated Highs members publicly on social media and by wearing clothing and sporting tattoos that pay tribute to deceased Highs members.

United States v. Brown et al.

- f. Highs members used common hand signs meant to signify a particular Highs sect, pay tribute to deceased gang members, or taunt and disrespect rival gangs.
- g. Within their territory, the Highs congregated at specific businesses and residences from which they controlled the area drug trade and dealt drugs, including fentanyl, cocaine, oxycodone, ecstasy (“MDMA”), and marijuana. These included, but were not limited to, the following: Merwin Liquors (700 West Broadway Avenue), Winner Gas (626 West Broadway Avenue), Walgreens (627 West Broadway Avenue), Boost Mobile (523 West Broadway Avenue), Autozone (501 West Broadway Avenue), Cub Foods (701 West Broadway Avenue), 4th Street Saloon (328 West Broadway Avenue), Wendy’s (421 West Broadway Avenue), Taco Bell (425 West Broadway Avenue), Holiday Gas (1624 Washington Avenue North), Marathon Gas (1120 West Broadway Avenue), and other businesses, all of which are located at or near the West Broadway Avenue and Lyndale Avenue North intersection in Minneapolis.

Purposes of the Enterprise

4. The purposes of the Enterprise included, but were not limited to, the following:

United States v. Brown et al.

- a. Enriching the leaders, members, and associates of the Enterprise through, among other things, robbery and illegal trafficking of controlled substances and firearms.
- b. Preserving and protecting the power, territory, reputation, and profits of the Enterprise through threats, intimidation, violence, and destruction, including, but not limited to, acts involving murder, robbery, assault, and other acts of violence.
- c. Promoting and enhancing the Enterprise and its members' and associates' activities.
- d. Keeping victims in fear of the Enterprise and in fear of its leaders, members, and associates through threats of violence and actual violence.
- e. Attacking and retaliating against rival gang members through acts of violence, including, but not limited to, murder, attempted murder, assault, and other acts of violence.

Manner and Means of the Enterprise

5. Among the manner and means by which the members and associates of the Enterprise agreed to conduct and participate in the conduct of the affairs of the Enterprise were the following:

- a. Committing, conspiring to commit, attempting and threatening to commit acts of violence, including murder, robbery, and assault to protect the Enterprise's power, territory, and property.

United States v. Brown et al.

- b. To generate income, Highs members and associates engaged in illegal activities under the protection of the Enterprise, including drug trafficking, weapons trafficking, and other illegal activities to generate income.
- c. Acquiring, distributing, carrying, and using firearms in acts of violence, retaliation, and protection against rival gangs.
- d. Employing and using gang-related terminology, symbols, phrases, and gestures to demonstrate affiliation with the gang.
- e. Perpetuating the Enterprise and to maintain their power, members and associates of the Enterprise committing and conspiring to commit acts involving murder and assault against individuals who posed a threat to the Enterprise, Highs members, or jeopardized its operations.
- f. Prohibiting Enterprise members and associates from cooperating with law enforcement under threat of death.
- g. To facilitate drug trafficking, Highs members and associates flew to Arizona and elsewhere to obtain fentanyl pills which were shipped or transported back to the Minneapolis area for sale.

The Racketeering Conspiracy

6. Beginning in or about 2014, and continuing through on or about the date of this Superseding Indictment, both dates being approximate and inclusive, within the District of Minnesota, and elsewhere, the defendants, **Dantrell Johnson, a.k.a. Trell Moe (“D.Johnson”); Gregory Hamilton, a.k.a. Lil’ Lord (“Hamilton”); Keon Pruitt, a.k.a.**

United States v. Brown et al.

**KenKen** (“Pruitt”); **Jovan Knight**, a.k.a. **JoJo**, a.k.a. **23** (“Knight”); **Tyreese Giles**, a.k.a. **Reese** (“Giles”); **Josiah Taylor**, a.k.a. **Joker** (“Taylor”); **Jarrett Robinson**, a.k.a. **Gator** (“J.Robinson”); **Trevaun Robinson**, a.k.a. **Tricky Tre** (“T.Robinson”); **Christopher Finch**, a.k.a. **Twin** (“Finch”); **Cortez Blakemore**, a.k.a. **Tez** (“Blakemore”); **Randy Tate**, a.k.a. **Randy** (“Tate”); **Trevoneia Felton**, a.k.a. **Tre** (“Felton”); **Malcolm Samuels**, a.k.a. **Reggie** (“Samuels”); **William Banks**, a.k.a. **Bear**, a.k.a. **Big Will** (“Banks”); **Ronald Washington**, a.k.a. **Black** (“R.Washington”), **Dashaun Morris**, a.k.a. **Mush** (“Morris”), **Isaiah Bell**, a.k.a. **Fatty** (“Bell”), **Gregory Brown**, a.k.a. **Lil’ G**, a.k.a. **Knowledge** (“G.Brown”), **Marques Walker**, a.k.a. **Q**, a.k.a. **Quez** (“Walker”), **Deandre Poe**, a.k.a. **Squizzy**, a.k.a. **Fat Squad** (“Poe”), **Clinton Brown**, a.k.a. **CJ** (“C.Brown”), **Amarjah Lester**, a.k.a. **M-Thang** (“Lester”), **Christopher Lee Washington**, a.k.a. **Flock**, a.k.a. **David Hendricks** (“C.Washington”), **Ernest Ketter**, a.k.a. **Shakedown** (“Ketter”), **Robert Lesure**, a.k.a. **Bibby Folks** (“Lesure”), **Avante Nix**, a.k.a. **Fat Folks** (“Nix”), **Arron Davis**, a.k.a. **A-Boogie** (“Davis”), and **Dashawn Jackson**, a.k.a. **D-Nice** (“Jackson”), together and with other persons known and unknown to the Grand Jury, being persons employed by and associated with the Highs, which was engaged in and the activities of which affected interstate and foreign commerce, knowingly and intentionally conspired to violate 18 U.S.C. § 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of that Enterprise through a pattern of racketeering activity consisting of multiple threats and acts involving:

United States v. Brown et al.

- a. Murder, in violation of Minnesota Code, Section 609.185, 609.19, 609.17, 609.05, and 609.175
- b. Robbery, in violation of Minnesota Code, Sections 609.24, 609.245, 609.17, 609.05, and 609.175.

And multiple offenses involving:

- c. Trafficking and distribution of controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846

7. It was further part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

United States v. Brown et al.

Overt Acts

8. In furtherance of the conspiracy, and to effect the object and purposes thereof, the defendants, **Dantrell Johnson, a.k.a. Trell Moe (“D.Johnson”); Gregory Hamilton, a.k.a. Lil’ Lord (“Hamilton”); Keon Pruitt, a.k.a. KenKen (“Pruitt”); Jovan Knight, a.k.a. JoJo, a.k.a. 23 (“Knight”); Tyreese Giles, a.k.a. Reese (“Giles”); Josiah Taylor, a.k.a. Joker (“Taylor”); Jarrett Robinson, a.k.a. Gator (“J.Robinson”); Trevaun Robinson, a.k.a. Tricky Tre (“T.Robinson”); Christopher Finch, a.k.a. Twin (“Finch”); Cortez Blakemore, a.k.a. Tez (“Blakemore”); Randy Tate, a.k.a. Randy (“Tate”); Trevoneia Felton, a.k.a. Tre (“Felton”); Malcolm Samuels, a.k.a. Reggie (“Samuels”); William Banks, a.k.a. Bear, a.k.a. Big Will (“Banks”); Ronald Washington, a.k.a. Black (“R.Washington”); Dashaun Morris, a.k.a. Mush (“Morris”); Isaiah Bell, a.k.a. Fatty (“Bell”); Gregory Brown, a.k.a. Lil’ G, a.k.a. Knowledge (“G.Brown”); Marques Walker, a.k.a. Q, a.k.a. Quez (“Walker”); Deandre Poe, a.k.a. Squizzy, a.k.a. Fat Squad (“Poe”); Clinton Brown, a.k.a. CJ (“C.Brown”); Amarjah Lester, a.k.a. M-Thang (“Lester”); Christopher Lee Washington, a.k.a. Flock, a.k.a. David Hendricks (“C.Washington”); Ernest Ketter, a.k.a. Shakedown (“Ketter”); Robert Lesure, a.k.a. Bibby Folks (“Lesure”); Avante Nix, a.k.a. Fat Folks (“Nix”); Arron Davis, a.k.a. A-Boogie (“Davis”); and Dashawn Jackson, a.k.a. D-Nice (“Jackson”); and others known and unknown to the Grand Jury, committed various overt acts, including, but not limited to, the following:**

- 1) On or about April 24, 2014, **J.Robinson** possessed a firearm.

United States v. Brown et al.

- 2) On or about August 11, 2015, **Tate** and Highs members were in a residence on Penn Avenue North, where **Tate** possessed marijuana with the intent to distribute and a Highs member possessed a firearm.
- 3) On or about August 11, 2015, **Tate** stated that he is a YNT member.
- 4) On or about September 27, 2016, M.Brown, another Highs member, and an unknown male were in a vehicle together when M.Brown fired a firearm into a vehicle driven by Victim A, who was injured by the gunfire.
- 5) On or about January 21 and January 23, 2017, M.Brown posted to Facebook advertising the sale of oxycodone.
- 6) On or about January 23, 2017, M.Brown sold two oxycodone pills.
- 7) On or about January 25, 2017, M.Brown posted a video to SnapChat in which he possessed two firearms.
- 8) On or about January 27, 2017, M.Brown was at a residence located at 26XX Emerson Avenue North, which is located within Highs territory, with other Highs members where he negotiated the sale of additional oxycodone pills and, when confronted by police, M.Brown and another Highs member ran from police.
- 9) On or about February 1, 2017, **J.Robinson** and other Highs members fired from a vehicle at two males, striking Victim B's residence in the process, and, after doing so, **J.Robinson** drove the vehicle to Winner Gas station.

United States v. Brown et al.

- 10) On or about March 11, 2017, **J.Robinson** possessed a firearm and shot at Victim C at a gas station in Brooklyn Center.
- 11) On or about March 11, 2017, **J.Robinson** and other Highs members were in a Facebook Live video and made hand signs and discussed “sliding” on “opps.”
- 12) On or about March 11, 2017, **J.Robinson** stated he is a YNT member.
- 13) On or about August 11, 2017, **Taylor** and a Highs member were in a vehicle together and drove away from the area of West Broadway Avenue in Minneapolis, where a shooting had just taken place.
- 14) On or about June 7, 2018, **T.Robinson** and another Highs member possessed two firearms.
- 15) On or about September 17, 2018, **Giles**, Robertson, **Banks**, **Samuels**, **Tate**, **J.Robinson**, now deceased Highs member Prince Martin, and other Highs members attended the funeral of Highs member Jamarius Shief, a.k.a. Boosie a.k.a. 50 Shotz, who had been killed by gunfire.
- 16) On or about March 4, 2019, **Banks** was in a vehicle with now deceased Highs member Prince Martin at Wendy’s, and possessed with intent to distribute marijuana and oxycodone pills and possessed U.S. currency.
- 17) On or about April 4, 2019, **Tate**, Robertson, and a Highs member were in a vehicle at Merwin Liquors and possessed marijuana with the intent to distribute.

United States v. Brown et al.

- 18) On or about April 15, 2019, following the shooting of a Highs member at Merwin Liquors, **Giles** and another Highs member were in a vehicle together and possessed a firearm.
- 19) On or about June 19, 2019, **C.Washington** possessed marijuana with the intent to distribute at Merwin Liquors
- 20) On or about June 21, 2019, **Giles**, Calvin Wright (“C.Wright”) and a Highs member were in or near a vehicle with a firearm in the trunk at Autozone.
- 21) On or about June 28, 2019, **C.Washington** conducted hand-to-hand drug transactions and possessed marijuana with the intent to distribute at Autozone.
- 22) On or about July 7, 2019, **Finch**, **T.Robinson**, and other Highs members attended a “cemetery birthday party” for deceased Highs member Jamarius Shief, a.k.a. Boosie a.k.a. 50 Shotz, who was killed by gunfire in 2018.
- 23) Later that same day, on or about July 7, 2019, **T.Robinson** and another Highs member shot in a crowded area and injured a female in downtown Minneapolis.
- 24) On or about July 7, 2019, **Finch** made several gang-related social media posts, including one where he made a “B” hand sign in tribute to deceased Highs member Jamarius Shief, a.k.a. Boosie a.k.a. 50 Shotz.

United States v. Brown et al.

- 25) On or about July 20, 2019, **Samuels** possessed marijuana and was with another Highs member at Winner Gas station where a firearm was hidden behind a dumpster.
- 26) On July 31, 2019, **T. Robinson** was at Winner Gas station while in possession of marijuana.
- 27) On or about August 2, 2019, **Hamilton** was at Winner Gas station and possessed a digital scale and possessed with the intent to distribute marijuana and MDMA pills.
- 28) On or about August 16, 2019, **Giles** possessed with intent to distribute marijuana and MDMA pills.
- 29) On or about August 16, 2019, **Tate** possessed pieces of a Glock-style firearm, items used to package drugs for individual sale, and a digital scale and possessed with intent to distribute marijuana and MDMA pills.
- 30) On or about August 27, 2019, **Banks** possessed marijuana with the intent to distribute at or around Merwin Liquors.
- 31) On or about September 9, 2019, **Giles**, **Tate**, now deceased Highs member Prince Martin, and other Highs members attended the funeral of deceased Highs member Kyreon Watkins, who was killed by gunfire.
- 32) On or about November 2, 2019, **Pruitt** and **Felton** drove in a stolen vehicle in Minneapolis.

United States v. Brown et al.

- 33) On or about December 31, 2019, **R.Washington** conducted multiple hand-to-hand drug sales at Merwin Liquors, and possessed marijuana, cocaine, and items to package drugs.
- 34) On or about January 2, 2020, **C.Washington, Ketter**, and a Highs member were in a vehicle together near the West Broadway Avenue and Lyndale Avenue North intersection and possessed a digital scale as well as marijuana with the intent to distribute.
- 35) On or about January 9, 2020, **Tate** and a Highs members were in a vehicle in and around Merwin Liquors and Winner Gas station, and possessed marijuana with the intent to distribute.
- 36) On or about February 24, 2020, **Felton** conducted hand-to-hand drug sales at Merwin Liquors and walked back and forth to a vehicle occupied by Highs members that contained marijuana.
- 37) On or about February 28, 2020, **Banks** possessed marijuana with the intent to distribute and a loaded firearm magazine.
- 38) On or about June 2, 2020, **D.Johnson** possessed a firearm.
- 39) On July 3, 2020, **Pruitt** drove to Wally's Foods and shot Victim D in the face.
- 40) On July 4, 2020, **Pruitt, Felton**, and a Highs member were in a vehicle together in Monroe County, Wisconsin, where **Pruitt**, who was driving, fled from police.

United States v. Brown et al.

- 41) On or about August 6, 2020, **Davis** conducted hand-to-hand drug transactions at Merwin Liquors.
- 42) On or about August 6, 2020, **Davis** possessed marijuana with the intent to distribute at Taco Bell.
- 43) On or about August 14, 2020, **Samuels** was at Winner Gas station and possessed items to package drugs and possessed with intent to distribute marijuana and MDMA pills.
- 44) From on or about August 15, 2020, to on or about October 25, 2021, **Walker** made numerous round-trip flights from Minneapolis, Minnesota to Phoenix, Arizona.
- 45) On or about October 12, 2020, **Felton** shot at a vehicle.
- 46) On or about October 23, 2020, **Pruitt** was with Highs members in a vehicle in which three firearms were located.
- 47) On or about October 23, 2020, **Pruitt** stated he is a Highs gang member.
- 48) On or about November 17, 2020, **J.Robinson** and **Felton** were at and around Merwin Liquors, where **Felton** conducted hand-to-hand drug sales and possessed marijuana and a digital scale. **Felton** walked back and forth to a vehicle driven by **J.Robinson**.
- 49) On or about November 20, 2020, **Knight** possessed a firearm at and around Winner Gas Station.

United States v. Brown et al.

- 50) On or about November 24, 2020, **Davis** and a Highs member possessed marijuana with the intent to distribute at Autozone.
- 51) On or about January 17, 2021, **Pruitt**, M.Brown, **T.Robinson**, **G.Brown**, now deceased Highs member Prince Martin, and other Highs members were in a music video that showed a location where Lows member Decari Starr was killed in 2010.
- 52) On or about January 22, 2021, **G.Brown** possessed fentanyl with the intent to distribute in south Minneapolis.
- 53) On or about February 2, 2021, **Pruitt**, **Finch**, and a Highs member were in a vehicle together at or around a restaurant near West Broadway Avenue and Lyndale Avenue and possessed a firearm, marijuana, and fentanyl pills.
- 54) On or about February 8, 2021, **Pruitt**, two Highs members, and others were in a vehicle at Merwin Liquors and possessed a firearm and marijuana.
- 55) On or about April 9, 2021, Serrano left a voicemail for J.Wright stating he is waiting on a package to be sent by the United States Postal Service (“USPS”).
- 56) On or about April 12, 2021, **Knight**, now deceased Highs member Jaylen Salter, juvenile Highs associate Victim E, and juvenile Highs member M.W. encircled a group of Somali males and robbed them at gunpoint.
- 57) During the April 12, 2021 robbery, Highs members fired several times at the victims, shooting Victim F in the leg and killing Highs associate Victim E.

United States v. Brown et al.

- 58) After the robbery during which Highs member Victim E was shot, **Knight** and the other Highs members loaded Victim E into a vehicle driven by juvenile Highs member M.W., with **Knight** and Salter following in a separate vehicle.
- 59) While driving from the April 12, 2021 robbery scene, the vehicle driven by the juvenile Highs member M.W. struck a vehicle driven by Victim G. Victim G got out of his vehicle and Salter shot and killed him.
- 60) From on or about May 16, 2021 to on or about March 18, 2022, M.Brown made at least 10 round-trip flights from Minneapolis, Minnesota to Phoenix, Arizona.
- 61) On or about May 29, 2021, **Bell** drove a vehicle containing other Highs members and possessed two firearms.
- 62) On or about June 7, 2021, **Finch**, Highs associate S.T., and another Highs member attempted to rob Victim H at or around Merwin Liquors.
- 63) On or about June 7, 2021, S.T. fired at Victim H, who also had a firearm, and Victim H shot and killed S.T.
- 64) On or about June 7, 2021, **Finch** took possession of the firearm that S.T. dropped when she was shot.
- 65) From on or about July 1, 2021 to on or about June 21, 2022, **G.Brown** made at least 11 round-trip flights from Minneapolis to Phoenix, Arizona.

United States v. Brown et al.

- 66) On or about July 21, 2021, Boyd possessed a firearm and possessed with the intent to distribute cocaine at and around Merwin Liquors.
- 67) On or about July 21, 2021, **Finch** possessed a firearm and **Tate** possessed a baggie containing fentanyl pills with the intent to distribute at or around Merwin Liquors.
- 68) On or about August 2, 2021, **Jackson** was in a vehicle at the Winner Gas station and possessed U.S. currency as well as fentanyl pills with the intent to distribute.
- 69) On or about August 8, 2021, M.Brown, **Finch**, Robertson, **Taylor**, **Tate**, **Pruitt**, W.Johnson, **D.Johnson**, **Hamilton**, and other Highs members attended a memorial at Winner Gas station for Prince Martin, who was believed to be killed by a rival gang member.
- 70) On or about August 8, 2021, **D.Johnson** and **Hamilton** drove to Wally's Foods and shot Victim I.
- 71) On or about August 8, 2021, **D.Johnson**, **Hamilton**, **Pruitt**, and W.Johnson traveled to the Skyline Market and shot and killed Victim J, whom they mistakenly believed was a rival Lows gang member.
- 72) On or about August 10, 2021 to on or about August 11, 2021, **Walker**, Highs member C.Wright, and an associate of **Walker** made a round-trip flight from Minneapolis, Minnesota to Houston, Texas.

United States v. Brown et al.

- 73) On or about August 10, 2021, **T.Robinson**, possessed a firearm and possessed with intent to distribute fentanyl while at 4th Street Saloon.
- 74) On or about August 11, 2021, **Lesure** and a Highs member possessed marijuana with the intent to distribute at the Winner Gas station. The Highs member possessed a firearm.
- 75) On or about August 24, 2021, **Lesure** possessed U.S. currency and marijuana with the intent to distribute at the Winner Gas station. **Hamilton** was at the Winner Gas station.
- 76) On or about September 9, 2021, **Giles** posted a tribute to Salter on Facebook, after Salter was shot and killed earlier that day at a barbershop in Minneapolis.
- 77) On or about September 9, 2021, **Giles** traveled to the Pennwood Market and shot and killed Victim K, who was a Lows member.
- 78) On or about September 14, 2021, **Taylor** shot and killed Victim L, who was a Lows member.
- 79) On or about September 20, 2021, **Blakemore** possessed marijuana with the intent to distribute.
- 80) On or about September 21, 2021, deceased Highs member Damone Rhodes possessed over \$21,000 in U.S. currency as well as over 1,000 fentanyl pills with the intent to distribute in northeast Minneapolis.

United States v. Brown et al.

- 81) On or about September 27, 2021, deceased Highs member Damone Rhodes texted **C.Washington** about **C.Washington** advancing him fentanyl pills for re-sale.
- 82) On or about October 13, 2021, **Lesure** possessed a firearm as well as marijuana with the intent to distribute at the Winner Gas station.
- 83) On or about November 7, 2021, **Knight**, Hodge, Mobley, and other Highs members shot at Victim M, striking Victim N and Victim O in the process.
- 84) On or about November 8, 2021, **Lesure** was with a Highs member at the Winner Gas station and possessed marijuana with the intent to distribute.
- 85) On or about November 9, 2021, **Lester** and deceased Highs member Damone Rhodes conducted hand-to-hand drug transactions within Highs territory.
- 86) On or about November 16, 2021, **Morris** and **Knight** conducted hand-to-hand drug sales of fentanyl at Winner Gas station.
- 87) On or about November 23, 2021, **Lester** and deceased Highs member Damone Rhodes conducted hand-to-hand drug transactions at the Holiday Gas station.
- 88) On or about November 24, 2021, **Lester** and deceased Highs member Damone Rhodes possessed a firearm and U.S. currency as well as 1,289 fentanyl pills with the intent to distribute at the Country Inn & Suites in Brooklyn Center, Minnesota.

United States v. Brown et al.

- 89) From on or about November 28, 2021 to on or about December 1, 2021, **G.Brown, Lesure, Nix**, and Highs member C. Wright flew from Minneapolis to Phoenix, Arizona and back to Minneapolis.
- 90) From on or about November 28, 2021 to on or about November 16, 2022, **Nix** made at least 10 round-trip flights from Minneapolis to Phoenix, Arizona.
- 91) On or about December 10, 2021, **Morris** requested to purchase 400 fentanyl pills for \$2,000 from **G.Brown** by Facebook direct message.
- 92) On or about December 14, 2021, deceased Highs member Damone Rhodes possessed marijuana and over 1,600 fentanyl pills with the intent to distribute in south Minneapolis.
- 93) On or about December 26, 2021, J.Wright messaged a photograph of fentanyl pills on a digital scale to Serrano.
- 94) On or about December 30, 2021, **Poe** paid J.Wright \$3,000 via CashApp.
- 95) On or about December 30, 2021, **G.Brown** provided his phone number to **Morris** by Facebook direct message.
- 96) On or about January 3, 2022, **Felton** was at Winner Gas station and possessed marijuana.
- 97) On or about January 7, 2022, **Knight** posted a SnapChat video where he possessed a firearm and stated, "when I see an Opp I'm going to strike."
- 98) On or about January 7, 2022, **Morris** possessed a firearm.

United States v. Brown et al.

- 99) On or about January 7, 2022, after destroying a memorial to deceased Lows member Emanuel Jones, **Knight** fired a firearm towards a vehicle containing Victim P, Victim Q, and Victim R. **Morris** was present and drove **Knight** away from the scene.
- 100) On or about January 11, 2022 to January 28, 2022, J.Wright texted Highs member C.Wright regarding fentanyl shipments and transactions.
- 101) On or about January 21, 2022, **Nix** was with a Highs member at the Winner Gas station in a vehicle purchased by **G.Brown**.
- 102) On or about February 1, 2022, **Jackson** possessed marijuana with the intent to distribute in Columbia Heights, Minnesota.
- 103) On or about February 6, 2022, **C.Washington** possessed a firearm, U.S. currency as well as marijuana with the intent to distribute.
- 104) On or about February 7, 2022, **Jackson** possessed fentanyl pills with the intent to distribute in Minneapolis.
- 105) From on or about February 10, 2022, to on or about March 30, 2022, at least nine USPS parcels were sent from a business in Phoenix, Arizona to Shine Beauty, in Brooklyn Park, Minnesota.
- 106) On or about February 23, 2022, **Lester** and deceased Highs member Damone Rhodes possessed marijuana and fentanyl with the intent to distribute within Highs territory.

United States v. Brown et al.

- 107) On or about March 17, 2022, **Poe** texted J.Wright “how much I sending” and J.Wright responded “how much he say I aint talk to kills (“C.Wright”).” On or about March 18, 2022, **Poe** responded to J.Wright “3,000.”
- 108) On or about March 30, 2022, J.Wright utilized his phone number to track a USPS parcel containing approximately 3 kilograms of fentanyl pills that was sent from the Phoenix Business to Shine Beauty.
- 109) On or about March 30, 2022, J.Wright and **Walker** placed several phone and FaceTime calls to each other.
- 110) On or about April 4, 2022, **Poe** texted J.Wright a screenshot showing that he deposited over \$5,200 in U.S. currency to J.Wright.
- 111) On or about April 4, 2022, a USPS parcel containing approximately 3 kilograms of fentanyl pills was sent from the Phoenix Business to Shine Beauty.
- 112) On or about April 4, 2022, J.Wright called the USPS to inquire about the parcel that was sent from the Phoenix Business to Shine Beauty.
- 113) On or about April 4, 2022, J.Wright and **Walker** placed several phone calls to each other.
- 114) On or about April 12, 2022, **Bell** possessed a digital scale as well as marijuana with the intent to distribute at Winner Gas station.
- 115) On or about April 12, 2022, **Blakemore**, while at Merwin Liquors, sold fentanyl pills.

United States v. Brown et al.

- 116) On or about April 12, 2022, Serrano messaged J.Wright "so we at \$62,150.00."
- 117) On or about April 25, 2022, **Walker** placed numerous FaceTime calls to C.Wright.
- 118) On or about April 26, 2022, **Blakemore**, while at Merwin Liquors, sold fentanyl pills.
- 119) On or about April 26, 2022, **Felton**, while at Winner Gas station conducted hand-to-hand drug sales.
- 120) On or about April 26, 2022, Highs member C.Wright received a USPS parcel at his residence from the Phoenix Business.
- 121) On or about April 26, 2022, after receiving the USPS from the Phoenix Business, Highs member C.Wright possessed 2.1 kilograms of fentanyl pills and U.S. currency in a vehicle. C.Wright possessed a large quantity of U.S. currency in his residence. **Giles** possessed U.S. currency.
- 122) On or about April 26, 2022, C.Wright texted J.Wright "they got me f\*\*k" and "obd call q." Q is a nickname for **Walker**.
- 123) On or about April 26, 2022, J.Wright called **Walker**. Both J.Wright and **Walker** called each other on multiple occasions on April 26, 2022.
- 124) On or about May 4, 2022, **Blakemore**, while at Walgreens, sold fentanyl pills.

United States v. Brown et al.

- 125) On or about May 10, 2022, J.Wright texted **Walker** regarding fentanyl transactions and shipments.
- 126) On May 10, 2022, J.Wright texted **Walker** “I aint booked ticket yet even if I gotta stay one more day I will, I just need to get as much as I can. I got to much in streets rn. Plus I’m waiting on word to see if Los (“Serrano”) coming this way as well before I take off.”
- 127) On May 10, 2022, J.Wright texted **Walker** “hit up squizzy (“**Poe**”) see if he got a dime or dub ready.”
- 128) On or about May 11, 2022, **Lester** possessed fentanyl with the intent to distribute within Highs territory.
- 129) On or about May 12, 2022, Serrano messaged J.Wright “he taking shit up north, so I’m tryna put a bunch aside for you.”
- 130) On or about May 12, 2022, J.Wright went to the Minneapolis-St. Paul International Airport to fly to Phoenix, Arizona with \$27,300 in U.S. currency.
- 131) On or about May 17, 2022, Jelks, while at Merwin Liquors, sold fentanyl pills.
- 132) On or about May 31, 2022, M.Brown possessed a firearm, drug paraphernalia, and U.S. currency, and possessed with the intent to distribute marijuana and oxycodone.

United States v. Brown et al.

- 133) On or about June 6, 2022, Jelks, while near Merwin Liquors, possessed U.S. currency and possessed with the intent to distribute fentanyl pills.
- 134) On or about June 10, 2022, **Taylor** and a Highs member possessed a firearm and possessed with intent to distribute fentanyl pills.
- 135) On or about June 11, 2022, **Blakemore** possessed fentanyl pills with the intent to distribute.
- 136) On or about June 14, 2022, **Blakemore** sold fentanyl pills.
- 137) On or about June 23, 2022, **Blakemore** possessed cellphones and U.S. currency and possessed with intent to distribute fentanyl pills.
- 138) On or about July 7, 2022, **R.Washington** conducted hand-to-hand drug sales in downtown Minneapolis and possessed fentanyl pills, crack cocaine, MDMA, marijuana, and U.S. currency.
- 139) On or about July 8, 2022, **Lesure**, **Nix**, and a Highs member possessed marijuana with the intent to distribute at Merwin Liquors.
- 140) On or about July 25, 2022, **Felton**, while at Winner Gas station conducted hand-to-hand drug sales and possessed a fentanyl pill, marijuana, and U.S. currency.
- 141) On or about July 27, 2022, Jelks, while at Winner Gas station, fired at a vehicle traveling westbound on West Broadway Avenue.
- 142) On or about August 9, 2022, Jelks sold fentanyl pills and Jelks and **R.Washington** sold a firearm at Merwin Liquors.

United States v. Brown et al.

- 143) On or about August 9, 2022, **Lesure** texted **Nix** "how many I get for 2000 blood." **Nix** responded "1,000." **Lesure** replied "I need 3."
- 144) On or about August 17, 2022, **Lesure** possessed marijuana and fentanyl pills with the intent to distribute at Merwin Liquors.
- 145) On or about September 3, 2022, Jelks, arranged for the future sale of fentanyl pills while at Cub Foods.
- 146) On or about September 4, 2022, **Ketter** took a photograph of a bag containing fentanyl pills.
- 147) On or about September 6, 2022, Jelks arranged the sale of fentanyl pills.
- 148) On or about September 11, 2022, **Ketter** discussed selling fentanyl pills for \$5 per pill.
- 149) On or about September 13, 2022, **Ketter** possessed fentanyl pills with the intent to distribute at a residence on 5th Street South in Minneapolis. **Ketter** possessed a firearm.
- 150) On or about September 13, 2022, **Nix** and **G.Brown** discussed **Nix** traveling to Arizona in a text message conversation.
- 151) On or about September 13, 2022, **Nix** flew from Minneapolis, Minnesota to Phoenix, Arizona.
- 152) On or about September 21, 2022, **C.Brown** possessed fentanyl pills with the intent to distribute.

United States v. Brown et al.

- 153) On or about October 3, 2022, **Finch** and **Davis** were in a vehicle at Walgreens and possessed U.S. currency and fentanyl pills with the intent to distribute.
- 154) On or about October 9, 2022, **Davis** possessed U.S. currency, a digital scale, and fentanyl pills with the intent to distribute at or around Fremont Avenue North.
- 155) On or about October 15, 2022, **Lesure** texted **Nix** that “Lil G (“**G.Brown**”) said call him gang.”
- 156) On or about October 23, 2022, **Nix** texted **Lesure** and discussed obtaining firearms.
- 157) On or about October 25, 2022, **Jackson** possessed U.S. currency, a digital scale as well as marijuana with the intent to distribute at Walgreens.
- 158) On or about October 26, 2022, to on or about October 28, 2022, **Nix** took a round-trip flight from Minneapolis, Minnesota to Phoenix, Arizona.
- 159) On or about October 28, 2022, **Nix** took a photograph of a USPS tracking receipt of a package sent from Glendale, Arizona to a P.O. Box in Hopkins, Minnesota.
- 160) On or about October 27, 2022, **J.Robinson** possessed two AR-15 rifles and a handgun.
- 161) From on or about November 6, 2022 to on or about May 24, 2023, **Poe** made numerous round-trip flights from Minneapolis, Minnesota to Phoenix, Arizona.

United States v. Brown et al.

- 162) On or about November 12, 2022, and on or about November 13, 2022, **Nix** discussed purchasing fentanyl pills from an Arizona supplier.
- 163) From on or about November 14, 2022, to on or about November 16, 2022, **Nix** made a round-trip flight from Minneapolis, Minnesota to Phoenix, Arizona.
- 164) On or about November 14, 2022, **Nix** told the Arizona supplier “I got ten all together, bro” and they discussed meeting up.
- 165) On or about January 17, 2023, **Felton**, Bailey, **Samuels**, and **Banks** conducted hand-to-hand drug sales at and around Boost Mobile.
- 166) On or about January 17, 2023, **Felton**, Bailey, and **Samuels** locked themselves in Boost Mobile. Bailey possessed with intent to distribute fentanyl pills.
- 167) On or about January 17, 2023, **Banks**, while at and near Boost Mobile, possessed fentanyl pills and U.S. currency.
- 168) On or about January 17, 2023, **Morris** attempted to purchase fentanyl pills through a Facebook direct message.
- 169) On or about January 18, 2023, **Bell** made several fentanyl hand-to-hand sales at and around Boost Mobile. A juvenile Highs member possessed fentanyl pills and a firearm.
- 170) On or about January 14, 2023, **Nix** and **Lesure** were together and possessed large quantities of U.S. currency.

United States v. Brown et al.

- 171) On or about January 31, 2023, **Lesure** possessed a firearm as well as marijuana with the intent to distribute near the intersection at 42<sup>nd</sup> Avenue North and Lyndale Avenue North.
- 172) On or about February 2, 2023, Jelks and Hodge sold fentanyl pills and Jelks sold a firearm.
- 173) On or about February 8, 2023, **Nix** took a photograph of a large quantity of fentanyl pills.
- 174) From on or about March 16, 2023, to on or about March 18, 2023, **Poe** made a round-trip flight from Minneapolis, Minnesota to Phoenix, Arizona.
- 175) From on or about March 17, 2023, to on or about March 18, 2023, **Poe** shipped four USPS parcels to the Minneapolis area from different locations in Arizona.
- 176) On or about April 4, 2023, M.Brown possessed a firearm, machine gun, and U.S. currency, and possessed with intent to distribute fentanyl pills.
- 177) On or about April 14, 2023, **Taylor** was at the Minneapolis-Saint Paul International Airport and possessed fentanyl pills with the intent to distribute.
- 178) On or about April 20, 2023, M.Brown, while in custody, directed a family member to recover 1.6 kilograms of fentanyl pills. M.Brown's family member possessed 1.6 kilograms of fentanyl with the intent to distribute.
- 179) On or about April 27, 2023, **Poe** possessed over \$23,000 in U.S. currency as well as fentanyl pills and powder with the intent to distribute.

United States v. Brown et al.

- 180) On or about June 9, 2023, **C.Brown** possessed fentanyl pills with the intent to distribute.
- 181) On or about August 15, 2023, Frazier assaulted and kidnapped Victim S at gunpoint.
- 182) On or about August 15, 2023, Frazier forced Victim S to disrespect several Lows members.
- 183) On or about August 15, 2023, Frazier took Victim S's vehicle at gunpoint.
- 184) On or about August 29, 2023, **C.Washington** possessed U.S. currency, and 809 fentanyl pills with the intent to distribute.
- 185) On or about August 29, 2023, **Ketter** fled from police and possessed U.S. currency.
- 186) On or about August 29, 2023, **Poe** was in a vehicle in Highs territory with deceased Highs member Antwan Eiland and possessed fentanyl pills and powder with the intent to distribute.
- 187) On or about September 20, 2023, **Poe**, **C.Brown**, and other Highs members were present at or around the 4<sup>th</sup> Street Saloon when Highs member Antwan Eiland was shot and killed.
- 188) On or about October 12, 2023, **C.Brown** possessed U.S. currency as well as fentanyl pills weighing approximately 339 grams with the intent to distribute.

United States v. Brown et al.

**NOTICE OF SPECIAL SENTENCING FACTORS**

1. Beginning in or about 2021, in the District of Minnesota, and continuing to in or about the date of this Superseding Indictment, as part of the above-described racketeering conspiracy, defendants **Gregory Hamilton, a.k.a. Lil' Lord ("Hamilton")**; **Jovan Knight, a.k.a. JoJo, a.k.a. 23 ("Knight")**; **Tyreese Giles, a.k.a. Reese ("Giles")**; **Josiah Taylor, a.k.a. Joker ("Taylor")**; **Trevaun Robinson, a.k.a. Tricky Tre ("T.Robinson")**; **Christopher Finch, a.k.a. Twin ("Finch")**; **Cortez Blakemore, a.k.a. Tez ("Blakemore")**; **Randy Tate, a.k.a. Randy ("Tate")**; **Trevoneia Felton, a.k.a. Tre ("Felton")**; **Malcolm Samuels, a.k.a. Reggie ("Samuels")**; **William Banks, a.k.a. Bear, a.k.a. Big Will ("Banks")**; **Ronald Washington, a.k.a. Black ("R.Washington")**, **Dashaun Morris, a.k.a. Mush ("Morris")**, **Isaiah Bell, a.k.a. Fatty ("Bell")**, **Gregory Brown, a.k.a. Lil' G, a.k.a. Knowledge ("G.Brown")**, **Marques Walker, a.k.a. Q, a.k.a. Quez ("Walker")**, **Deandre Poe, a.k.a. Squizzy, a.k.a. Fat Squad ("Poe")**, **Clinton Brown, a.k.a. CJ ("C.Brown")**, **Amarjah Lester, a.k.a. M-Thang ("Lester")**, **Christopher Lee Washington, a.k.a. Flock, a.k.a. David Hendricks ("C.Washington")**, **Ernest Ketter, a.k.a. Shakedown ("Ketter")**, **Robert Lesure, a.k.a. Bibby Folks ("Lesure")**, **Avante Nix, a.k.a. Fat Folks ("Nix")**, **Arron Davis, a.k.a. A-Boogie ("Davis")**, and **Dashawn Jackson, a.k.a. D-Nice ("Jackson")**, did combine, conspire, confederate, and agree, together and with others to knowingly and intentionally distribute or possess with intent to distribute at least 400 grams of a mixture or substance containing a detectable amount of any analogue N-phenyl-N-[1-(2-phenylethyl)-4-

United States v. Brown et al.

piperidinyl] propanamide, commonly known as fentanyl, or at least 100 grams of a mixture or substance containing a detectable amount of any analogue of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl (Schedule II controlled substances), in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(vi), and 846.

2. On or about April 12, 2021, in the District of Minnesota, as part of the above-described racketeering conspiracy, the defendant, **Jovan Knight, a.k.a. JoJo, a.k.a. 23**, aided and abetted by others, did murder Victim E, that is, did cause the death of Victim E with premeditation and with intent to affect the death of a human being while committing and attempting to commit aggravated robbery, in violation of Minnesota Code, Sections 609.185(a)(1), 609.185(a)(3), and 609.05.

3. On or about August 8, 2021, in the District of Minnesota, as part of the above-described racketeering conspiracy, the defendants, **Dantrell Johnson, a.k.a. Trell Moe; Gregory Hamilton, a.k.a. Lil' Lord; and Keon Pruitt, a.k.a. KenKen**, aided and abetted by each other, did murder Victim J, that is, did cause the death of Victim J, with premeditation and with intent to affect the death of Victim J or another person, in violation of Minnesota Code, Sections 609.185(a)(1) and 609.05.

4. On or about September 9, 2021, in the District of Minnesota, as part of the above-described racketeering conspiracy, the defendant, **Tyreese Giles, a.k.a. Reese**, did murder Victim K, that is, did cause the death of Victim K, with premeditation and with

United States v. Brown et al.

intent to affect the death of Victim K or another person, in violation of Minnesota Code Sections, 609.185(a)(1) and 609.05.

5. On or about September 14, 2021, in the District of Minnesota, as part of the above-described racketeering conspiracy, the defendant, **Josiah Taylor, a.k.a. Joker**, did murder Victim L, that is, did cause the death of Victim L, with premeditation and with intent to affect the death of Victim L or another person, in violation of Minnesota Code, Sections 609.185(a)(1) and 609.05.

All in violation of Title 18, United States Code, Section 1962(d).

United States v. Brown et al.

**COUNT TWO**

**Using and Carrying a Firearm During and in Relation to a Crime of Violence  
Causing Death**

1. At all times relevant to this Superseding Indictment, the Highs, as described in paragraphs one through five of Count One, which are realleged and incorporated by reference as if fully set forth herein, including its leadership, membership, and associates, constituted an “enterprise,” as defined by 18 U.S.C. § 1959(b)(2), that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

2. At all times relevant to this Superseding Indictment, the Highs enterprise, through its members, leaders, and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is, multiple acts involving murder, in violation of Minnesota Code, Section 609.185, 609.19, 609.17, 609.05, and 609.17; robbery, in violation of Minnesota Code, Sections 609.24, 609.245, 609.17, 609.05, and 609.175; and offenses involving trafficking and distribution of controlled substances, in violation of Title 21, United States Code, Sections 841 and 846.

United States v. Brown et al.

3. On or about August 8, 2021, in the District of Minnesota, the defendants,

**DANTRELL JOHNSON,**  
**a.k.a. Trell Moe,**  
**GREGORY HAMILTON,**  
**a.k.a. Lil' Lord,**  
**KEON PRUITT,**  
**a.k.a. KenKen,**  
and,  
**WILLIAM JOHNSON,**  
**a.k.a. Lil' Will,**

each aided and abetted by the other and by others known and unknown to the Grand Jury, for the purpose of gaining entrance, maintaining and increasing position in the Highs, an enterprise engaged in racketeering activity, did knowingly and intentionally murder Victim J, in violation of Minnesota Code, Sections 609.185(a)(1) and 609.05, in violation of Title 18, United States Code, Sections 1959(a)(1) (Murder in Aid of Racketeering) and 2.

4. On or about August 8, 2021, in the District of Minnesota, the defendants,

**DANTRELL JOHNSON,**  
**a.k.a. Trell Moe,**  
**GREGORY HAMILTON,**  
**a.k.a. Lil' Lord,**  
**KEON PRUITT,**  
**a.k.a. KenKen,**  
and,  
**WILLIAM JOHNSON,**  
**a.k.a. Lil' Will,**

each aided and abetted by the other and by others known and unknown to the Grand Jury, did violate Title 18, United States Code, Section 924(c)(1)(A), that is, did knowingly and intentionally use and carry a firearm during and in relation to a crime of violence for which

United States v. Brown et al.

they may be prosecuted in a court of the United States, namely, the Murder in Aid of Racketeering (Title 18, United States Code, Section 1959(a)(1)) of Victim J, and in the course of such violation, did cause the death of Victim J through the use of a firearm, which killing was first-degree murder, as defined in Title 18, United States Code, Section 1111. In violation of Title 18, United States Code, Sections 924(j) and 2.

United States v. Brown et al.

**COUNT THREE**  
**Conspiracy to Distribute Controlled Substances**  
**(Violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A) and 846)**

From on or about August 1, 2015, and continuing through on or about April 26, 2023, in the State and District of Minnesota and elsewhere, the defendants,

**JOVAN KNIGHT,**  
a.k.a. JoJo,  
a.k.a. 23,  
**JOSIAH TAYLOR,**  
a.k.a. Joker,  
**TREVAUN ROBINSON,**  
a.k.a. Tricky Tre,  
**CHRISTOPHER FINCH,**  
a.k.a. Twin,  
**CORTEZ BLAKEMORE,**  
a.k.a. Tez,  
**RANDY TATE,**  
a.k.a. Randy,  
**TREVONEIA FELTON,**  
a.k.a. Tre,  
**MALCOLM SAMUELS,**  
a.k.a. Reggie,  
**WILLIAM BANKS,**  
a.k.a. Bear,  
a.k.a. Big Will,  
**RONALD WASHINGTON,**  
a.k.a. Black,  
**DASHAUN MORRIS,**  
a.k.a. Mush,  
**EARNEST BOYD,**  
a.k.a. Shaky Shawn,  
**ISAIAH BELL,**  
a.k.a. Fatty,  
**GREGORY BROWN,**  
a.k.a. Lil' G,  
a.k.a. Knowledge,  
**MARQUES WALKER,**  
a.k.a. Q,

United States v. Brown et al.

**a.k.a. Quez,  
DEANDRE POE,  
a.k.a. Squizzy,  
a.k.a. Fat Squad,  
CLINTON BROWN,  
a.k.a. CJ,  
AMARJAH LESTER,  
a.k.a. M-Thang,  
CHRISTOPHER LEE WASHINGTON,  
a.k.a. Flock,  
a.k.a. David Hendricks,  
ERNEST KETTER,  
a.k.a. Shakedown,  
ROBERT LESURE,  
a.k.a. Bibby Folks,  
AVANTE NIX,  
a.k.a. Fat Folks,  
ARRON DAVIS,  
a.k.a. A-Boogie,  
DASHAWN JACKSON,  
a.k.a. D-Nice,  
JADARIUS WRIGHT,  
and  
CARLOS SERRANO,  
a.k.a. Nogoodlos,  
a.k.a. Los,**

did knowingly and intentionally conspire with others known and unknown to the Grand Jury to distribute at least 400 grams of a mixture or substance containing a detectable amount of (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide) (a Schedule II controlled substance), commonly known as fentanyl, or at least 100 grams of a mixture or substance containing a detectable amount of any analogue of (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide) (a Schedule II controlled substance), commonly known as fentanyl; cocaine (a Schedule II controlled substance); 3,4-

United States v. Brown et al.

methylene dioxy methamphetamine (“MDMA”) (a Schedule I controlled substance); oxycodone (a Schedule II controlled substance); and marijuana (a Schedule I controlled substance); all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), 841(b)(1)(C) and 846.

United States v. Brown et al.

**COUNT FOUR**  
**Possession of a Firearm in Furtherance of Drug Trafficking**

On or about July 21, 2021, in the State and District of Minnesota, the defendant,

**CHRISTOPHER FINCH,  
a/k/a Twin,**

did knowingly and intentionally, and in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, conspiracy to distribute controlled substances as charged in Count Three of this Superseding Indictment, did possess a firearm, namely, a Glock 43X nine-millimeter semiautomatic handgun, all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

United States v. Brown et al.

**COUNT FIVE**  
**Possession of a Firearm in Furtherance of Drug Trafficking**

On or about July 21, 2021, in the State and District of Minnesota, the defendant,

**EARNEST BOYD,  
a/k/a Shaky Shawn,**

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, conspiracy to distribute controlled substances as charged in Count Three of this Superseding Indictment, did knowingly and intentionally possess a firearm, namely, a Taurus nine-millimeter semiautomatic handgun; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

United States v. Brown et al.

**COUNT SIX**  
**Possession of a Firearm in Furtherance of Drug Trafficking**

On or about August 10, 2021, in the State and District of Minnesota, the defendant,

**TREVAUN ROBINSON,  
a/k/a Tricky Tre,**

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, conspiracy to distribute controlled substances as charged in Count Three of this Superseding Indictment, did knowingly and intentionally possess a firearm, namely, a FN model 503 nine-millimeter semiautomatic handgun; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

United States v. Brown et al.

**COUNT SEVEN**  
**Possession of a Firearm in Furtherance of Drug Trafficking**

On or about June 10, 2022, in the State and District of Minnesota, the defendant,

**JOSIAH TAYLOR,  
a/k/a Joker,**

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, conspiracy to distribute controlled substances as charged in Count Three of this Superseding Indictment, did knowingly and intentionally possess a firearm, namely, a Glock model 20, 10-milimeter semi-automatic handgun; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

United States v. Brown et al.

**COUNT EIGHT**  
**Possession of a Firearm in Furtherance of Drug Trafficking**

On or about November 24, 2021, in the State and District of Minnesota, the defendant,

**AMARJAH LESTER,  
a/k/a M-Thang,**

did knowingly and intentionally possess a firearm, namely, a Smith and Wesson M&P M20 and a Glock 22 with an extended magazine in furtherance of a drug trafficking crime and did knowingly and intentionally possess said firearm during and in relation to said drug trafficking crime, that is, the offense set forth in Count Three of this Superseding Indictment, did, all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

United States v. Brown et al.

**COUNT NINE**  
**Distribution of a Controlled Substance**

On or about March 30, 2022, in the State and District of Minnesota, the defendant,

**MARQUES WALKER,  
a.k.a Q  
a.k.a. Quez  
and  
JADARIUS WRIGHT**

did unlawfully, knowingly and intentionally distribute at least 400 grams of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, or at least 100 grams of a mixture or substance containing a detectable amount of any analogue of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, (Schedule II controlled substances), all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(vi).

United States v. Brown et al.

**COUNT TEN**  
**Possession with Intent to Distribute a Controlled Substance**

On or about April 26, 2022, in the State and District of Minnesota, the defendant,

**MARQUES WALKER,  
a.k.a Q  
a.k.a. Quez  
and  
JADARIUS WRIGHT**

did unlawfully, knowingly and intentionally possess with the intent to distribute at least 400 grams of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, commonly known as fentanyl, or at least 100 grams of a mixture or substance containing a detectable amount of any analogue of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, (Schedule II controlled substances), all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(vi).

United States v. Brown et al.

**COUNT ELEVEN**  
**Kidnapping in Aid of Racketeering**

1. At all times relevant to this Superseding Indictment, the Highs, as described in paragraphs one through five of Count One, which are realleged and incorporated by reference as if fully set forth herein, including its leadership, membership, and associates, constituted an “enterprise,” as defined by 18 U.S.C. § 1959(b)(2), that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

2. At all times relevant to this Superseding Indictment, the Highs enterprise, through its members, leaders, and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is, multiple acts involving murder, in violation of Minnesota Code, Section 609.185, 609.19, 609.17, 609.05, and 609.17; robbery, in violation of Minnesota Code, Sections 609.24, 609.245, 609.17, 609.05, and 609.175; and offenses involving trafficking and distribution of controlled substances, in violation of Title 21, United States Code, Sections 841 and 846.

United States v. Brown et al.

3. On or about August 15, 2023, in the State and District of Minnesota, the defendant,

**LENEAL FRAZIER, JR.,**

for the purpose of gaining entrance, maintaining and increasing position in the Highs, an Enterprise engaged in racketeering activity, did kidnap Victim S, in violation of Minnesota Code, Section 609.25. All in violation of Title 18, United States Code, Section 1959(a)(1).

United States v. Brown et al.

**COUNT TWELVE**  
**Assault in Aid of Racketeering**

1. At all times relevant to this Superseding Indictment, the Highs, as described in paragraphs one through five of Count One, which are realleged and incorporated by reference as if fully set forth herein, including its leadership, membership, and associates, constituted an “enterprise,” as defined by 18 U.S.C. § 1959(b)(2), that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

2. At all times relevant to this Superseding Indictment, the Highs enterprise, through its members, leaders, and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is, multiple acts involving murder, in violation of Minnesota Code, Section 609.185, 609.19, 609.17, 609.05, and 609.17; robbery, in violation of Minnesota Code, Sections 609.24, 609.245, 609.17, 609.05, and 609.175; and offenses involving trafficking and distribution of controlled substances, in violation of Title 21, United States Code, Sections 841 and 846.

United States v. Brown et al.

3. On or about August 15, 2023, in the State and District of Minnesota, the defendant,

**LENEAL FRAZIER, JR.**

for the purpose of gaining entrance, maintaining and increasing position in the Highs, an enterprise engaged in racketeering activity, did assault Victim S with a dangerous weapon, in violation of Minnesota Code, Sections 609.221 and 609.222. All in violation of Title 18, United States Code, Section 1959(a)(3).

United States v. Brown et al.

**COUNT THIRTEEN**  
**Carjacking**

On or about August 15, 2023, in the State and District of Minnesota, the defendant,

**LENEAL FRAZIER, JR.,**

did knowingly and unlawfully take a motor vehicle, that is a Ford Escape bearing

Minnesota license plate PGE893, and vehicle identification number

1FMCU0G97DUB85440, that had been transported, shipped, and received in interstate

and foreign commerce, from the person and presence of J.E., by force and violence and

by intimidation, with the intent to cause serious bodily harm, all in violation of Title 18,

United States Code, Section 2119(1).

United States v. Brown et al.

**COUNT FOURTEEN**  
**Brandishing a Firearm During and in Relation to a Crime of Violence**

On or about August 15, 2023, in the State and District of Minnesota the defendant,

**LENEAL FRAZIER, JR.,**

did knowingly brandish, use, and carry a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Carjacking, as alleged in Count 2 of this Superseding Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

United States v. Brown et al.

## FORFEITURE ALLEGATIONS

Counts 1-14 of this Superseding Indictment are realleged and incorporated reference for the purpose of alleging forfeitures pursuant Title 18, United States Code, Sections 924(d) and 1963, and Title 21, United States Code, Section 853.

Upon conviction of Count 1, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963, the following property:

- a. any interest acquired or maintained in violation of section 1962;
- b. any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over, any enterprise which the defendant[s] established, operated, controlled, conducted, or participated in the conduct of, in violation of section 1962; and
- c. any property constituting, or derived from, any proceeds obtained, directly or indirectly, from racketeering activity or unlawful debt collection in violation of 1962.

Upon conviction of any of **Counts 2, 4-8, and 11-14** of this Superseding Indictment the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms, ammunition, and accessories involved in or used in the commission of **Counts 2, 4-8, and 11-14** of this Superseding Indictment.

Upon conviction of **Counts 3 and 9-10** of this Superseding Indictment, the defendants shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a)(1) and (2), any and all property constituting, or derived from, any proceeds they obtained directly or indirectly as a result of said violations, and any and all property

United States v. Brown et al.

used, or intended to be used, in any manner or part to commit or to facilitate the commission of said violations.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 1963(m) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

---

UNITED STATES ATTORNEY

FOREPERSON

---

BRIAN W. LYNCH  
Trial Attorney  
Ohio Bar No. 86245  
Violent Crimes and Racketeering Section  
U.S. Department of Justice  
Washington, DC 20530

SAMANTHA H. BATES  
Assistant United States Attorney  
Minnesota Bar No. 395002  
United States Attorneys' Office  
District of Minnesota  
Minneapolis, Minnesota 55415

JUSTIN A. WESLEY  
Assistant United States Attorney  
Minnesota Bar No. 389189  
United States Attorneys' Office  
District of Minnesota  
Minneapolis, Minnesota 55415